

**BURSOR & FISHER, P.A.**

L. Timothy Fisher (State Bar No. 191626)  
Yeremey O. Krivoshey (State Bar No. 295032)  
Blair E. Reed (State Bar No. 316791)  
1990 North California Blvd., Suite 940  
Walnut Creek, CA 94596  
Telephone: (925) 300-4455  
Facsimile: (925) 407-2700  
E-Mail: ltfisher@bursor.com  
ykrivoshey@bursor.com  
breed@bursor.com

**BURSOR & FISHER, P.A.**

Scott A. Bursor (State Bar No. 276006)  
888 Seventh Avenue  
New York, NY 10019  
Telephone: (212) 989-9113  
Facsimile: (212) 989-9163  
E-Mail: scott@bursor.com

*Attorneys for Plaintiff*

**ELLIS LAW GROUP LLP**

Mark E. Ellis - 127159  
Anthony P. J. Valenti - 284542  
Lawrence K. Iglesias - 303700  
1425 River Park Drive, Suite 400  
Sacramento, CA 95815  
Tel: (916) 283-8820  
Fax: (916) 283-8821  
mellis@ellislawgrp.com  
avalenti@ellislawgrp.com  
liglesias@ellislawgrp.com

*Attorneys for Defendant*  
**RASH CURTIS & ASSOCIATES**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

SANDRA MCMILLION, JESSICA  
ADEKOYA, and IGNACIO PEREZ, on  
Behalf of Themselves and all Others Similarly  
Situating,

Plaintiffs,

v.

RASH CURTIS & ASSOCIATES,

Defendant.

Case No. 4:16-cv-03396-YGR

**JOINT TRIAL EXHIBIT LIST**

Date: April 12, 2019  
Time: 9:00 a.m.  
Courtroom 1, 4th Floor

Hon. Yvonne Gonzalez Rogers

**I. PLAINTIFFS' TRIAL EXHIBIT LIST:**

<b>TRIAL EXHIBIT NO.</b>	<b>DESCRIPTION</b>	<b>SPONSORING WITNESS</b>	<b>STIP. TO ADMIT</b>	<b>OBJECTION</b>	<b>DATE ADMITTED</b>
<b>1</b>	Perez Account RCA 001-004	Dan Correa	Yes		
<b>2</b>	Global Connect Manual RCA 044-120	Dan Correa	Yes		
<b>3</b>	5/21/16 Natasha Paff to Nick Keith email re Request for Proposal	Nick Keith	Yes		
<b>4</b>	5/31/16 Kaweah Delta Request for Proposal	Nick Keith	No	Relevance FRE 400-403 Not specific as to what portions or pages	
<b>6</b>	9/28/12 Status Code Matrix	Dan Correa	Yes		
<b>7</b>	2/8/16-2/10/16 emails w/ N. Keith, Chris Paff, Dan Correa, Blake North re call log errors	Nick Keith	Yes		
<b>8</b>	2/13/16-2/18/16 emails w. N. Keith, N. Paff, B. Keith, T. Paff re cell phones/phone fields	Nick Keith	Yes		
<b>9</b>	2/24/14-2/25/14 emails w/ N. Paff, N. Keith, Kizer, B. Keith, C. Paff, T. Paff re cell/phone field	Nick Keith	Yes		
<b>10</b>	8/3/15-8/4/15 emails w/ N. Keith, B. Keith, C. Paff, T. Paff, N. Paff re cell phone scrubs/phone fields	Nick Keith	Yes		
<b>11</b>	5/12/16 emails w/ N. Keith, B. Keith, C. Paff re 5+ phone fields	Nick Keith	Yes		
<b>12</b>	5/12/16 emails w. N. Keith, Dan Correa, Greg Wilbert re phone field 5+ custom	Nick Keith	Yes		
<b>13</b>	5/22/15 emails w/ N. Keith, B. Keith, D.	Nick Keith	Yes		

<b>TRIAL EXHIBIT NO.</b>	<b>DESCRIPTION</b>	<b>SPONSORING WITNESS</b>	<b>STIP. TO ADMIT</b>	<b>OBJECTION</b>	<b>DATE ADMITTED</b>
	Correa re chomp legal snag list				
<b>14</b>	6/20/13 emails w. N. Keith, Greg Wilbert, Shane Sonognini, C. Paff, Kizer re DNC list	Nick Keith	Yes		
<b>15</b>	1/27/17 emails w/ N. Keith, M. Paff, B. Keith re call skipped-not made	Nick Keith	Yes		
<b>16</b>	Reynoso Facesheet	Nick Keith	Yes		
<b>17</b>	11/21/16 emails w. N. Keith, Missy Leano re prior consent docs from Sutter	Nick Keith	Yes		
<b>18</b>	10/4/17 Notice of Rule 30(b)(6) Deposition of Rash Curtis & Associates	Dan Correa	No	Relevance FRE 400-403	
<b>19</b>	DAKCS Software Systems Client Services Manual	Dan Correa	Yes		
<b>20</b>	DAKCS Software Systems Client Services Utilities Help Manual	Dan Correa	Yes		
<b>21</b>	DAKCS Software Systems Vocality Help Manual	Dan Correa	Yes		
<b>22</b>	DAKCS Software Systems Vocality Beyond and Sting Setup	Dan Correa	Yes		
<b>23</b>	County of Solano Amendment to Request for Qualifications for Healthcare Related Debt Collection Services	Dan Correa	No	Relevance FRE 400-403	
<b>24</b>	Rash Curtis & Associates Collection Agency Debt Recovery Services Company Information	Dan Correa	Yes		
<b>26</b>	5/25/15-5/27/15 emails w. D. Correa, D. Anderson, B. Conrad, Kizer, B. Keith, C. Paff re Sutter Foti Message	Dan Correa	No	Relevance FRE 400-403	

<b>TRIAL EXHIBIT NO.</b>	<b>DESCRIPTION</b>	<b>SPONSORING WITNESS</b>	<b>STIP. TO ADMIT</b>	<b>OBJECTION</b>	<b>DATE ADMITTED</b>
<b>27</b>	9/15/15 emails w. D. Anderson, D. Correa, C. Paff, K. Boddie, B. Conrad, Kizer re skip lists	Dan Correa	Yes		
<b>28</b>	4/12/13 email w. D. Correa, B. O’Gara re whisper campaign	Dan Correa	Yes		
<b>29</b>	5/6/13 email w. B. Kimbell, D. Correa re status code campaigns	Dan Correa	Yes		
<b>30</b>	5/21/13 email w. B. Kimbell, D. Correa re hoarding campaign	Dan Correa	Yes		
<b>31</b>	2/7/17 email w. B. Keith, D. Correa, D. Anderson re DNC list	Dan Correa	Yes		
<b>32</b>	12/11/14-12/12/14 emails w. B. North, C. Paff, D. Correa, B. Kimbell, B. Conrad re opt out list	Dan Correa	Yes		
<b>33</b>	12/29/16 emails w/ D. Correa, M. Paff, T. Mitchell re cease and desist call lists	Dan Correa	Yes		
<b>34</b>	6/29/17 emails w. T. Paff, B. Keith, C. Paff, N. Paff re 2015 FCC Ruling	Bob Keith	No	Relevance FRE 400-403	
<b>35</b>	4/27/15 email w. B. Keith, C. Paff, T. Paff re cell phone scrub	Bob Keith	No	Relevance FRE 400-403	
<b>36</b>	10/12/16 email w. B. Keith, T. Paff, C. Paff re calling cell phones	Bob Keith	No	Relevance FRE 400-403	
<b>37</b>	1/5/16 email from B. Keith to staff re 90 day call count	Bob Keith	Yes		
<b>38</b>	5/5/16-5/6/16 emails w. D. Correa, B. Keith, B. North, C. Paff re blocking fields 5+	Bob Keith	Yes		

<b>TRIAL EXHIBIT NO.</b>	<b>DESCRIPTION</b>	<b>SPONSORING WITNESS</b>	<b>STIP. TO ADMIT</b>	<b>OBJECTION</b>	<b>DATE ADMITTED</b>
<b>42</b>	8/5/13 emails w. B. Kimbell, C. Paff, D. Correa, B. Keith, Kizer re back to school month	Chris Paff	No	Relevance FRE 400-403	
<b>43</b>	2/28/14 email w/ A. Hyden, C. Paff re CPS questions	Chris Paff	Yes		
<b>44</b>	6/15/17 email w. C. paff re robocalls	Chris Paff	Yes		
<b>45</b>	Questions Excerpted from the FCC's Robocall Blocking NOI	Chris Paff	Yes		
<b>46</b>	6/30/17 Declaration of Darrin Bird, ECF Doc. No. 50-3	Darrin Bird	Yes		
<b>47</b>	7/3/17 Declaration of Robert Keith, ECF Doc. No. 50-2	Bob Keith	Yes		
<b>48</b>	DAKCS Software Systems VIC Client, Exhibit 11 to 12/11/17 Krivoshey Decl., ECF Doc. No. 139-2 DAKCS00001-266	Randall A. Snyder	No	Relevance FRE 400-403 Not specific as to which portions or pages FRE 702	
<b>49</b>	Defendant Rash Curtis & Associates' Response to Plaintiffs' Supporting Separate Statement, ECF Doc. No. 152-7	N/A	No	Relevance FRE 400-403	
<b>50</b>	Exhibit 22 to 1/8/18 Declaration of L. Timothy Fisher, ECF Doc. No. 151-1	Colin B. Weir	Yes		
<b>51</b>	Exhibit 23 to the 1/8/18 Declaration of L. Timothy Fisher, ECF Doc. No. 151-1	Colin B. Weir	No	Relevance FRE 400-403 FRE 702	

TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STIP. TO ADMIT	OBJECTION	DATE ADMITTED
52	Exhibit 2 to 4/13/18 Krivoshey Decl., ECF Doc. No. 190-1, RCA's Opposition to Plaintiff's Separate Statement of Undisputed Facts in Support of Summary Judgment or Partial Summary Judgment in <i>Hernandez v. Rash Curtis &amp; Associates</i> , Case No. 2:16-cv-02455-GHW (E.D. Cal. Nov. 13, 2017), ECF Doc. No. 34.	N/A	No	Relevance FRE 400-403	
53	5/5/16 emails w. N. Paff, B. Keith, C. Paff, D. Correa, T. Paff re human error	Dan Correa	Yes		
54	11/12/18 Supplemental Declaration of Randall A. Snyder	Randall A. Snyder	No	Relevance FRE 400-403 FRE 702	
55	11/12/18 Class Member Data Tabulation Report of Anya Verkhovskaya	Anya Verkhovskaya	No	Relevance FRE 400-403 FRE 702	
56	11/12/18 Declaration of Colin B. Weir	Colin B. Weir	No	Relevance FRE 400-403 FRE 702	
57	Global Connect Call Detail Records, as discussed by Colin Weir at his 12/11/18 Deposition	N/A	No	Relevance FRE 400-403 FRE 702	
58	VIC Call Detail Records, as discussed by Colin Weir at his 12/11/18 Deposition	N/A	No	Relevance FRE 400-403 FRE 702	
59	TCN Call Detail Records, as discussed by Colin Weir at his 12/11/18 Deposition	N/A	No	Relevance FRE 400-403 FRE 702	

<b>TRIAL EXHIBIT NO.</b>	<b>DESCRIPTION</b>	<b>SPONSORING WITNESS</b>	<b>STIP. TO ADMIT</b>	<b>OBJECTION</b>	<b>DATE ADMITTED</b>
<b>60</b>	Defendant's Account Data as discussed by Colin Weir at his 12/11/18 Deposition (including all account numbers, demographic and personal information, and phone fields one through ten)	N/A	No	Relevance FRE 400-403 FRE 702	
<b>61</b>	GC_calls2, as discussed at Anya Verkhovskaya's 12/6/18 Deposition	N/A	No	Relevance FRE 400-403 FRE 702	
<b>62</b>	TCN_calls-2, as discussed at Anya Verkhovskaya's 12/6/18 Deposition	N/A	No	Relevance FRE 400-403 FRE 702	
<b>63</b>	VIC_calls-2, as discussed at Anya Verkhovskaya's 12/6/18 Deposition	N/A	No	Relevance FRE 400-403 FRE 702	
<b>64</b>	Defendant's Initial Disclosures	N/A	No	Relevance FRE 400-403 FRE 702	
<b>65</b>	Defendant's Responses to Plaintiffs' First Set of Interrogatories	N/A	Yes		
<b>66</b>	Defendant's Responses to Plaintiffs' First Set of Requests for Production	N/A	Yes		
<b>67</b>	Global Connect Dialer Sample	N/A	Yes		
<b>68</b>	Audit checklist RCA000121-123	N/A	Yes		
<b>69</b>	Rash Curtis Policy & Procedure: Quality Assurance Program – audit guidelines RCA000124-135	N/A	Yes		
<b>70</b>	Rash Curtis Quality Assurance Program – Employee Acknowledgement RCA000164	N/A			

<b>TRIAL EXHIBIT NO.</b>	<b>DESCRIPTION</b>	<b>SPONSORING WITNESS</b>	<b>STIP. TO ADMIT</b>	<b>OBJECTION</b>	<b>DATE ADMITTED</b>
<b>71</b>	Defendant Rash Curtis & Associates' Responses to Plaintiff's Interrogatories (Set One) in <i>McBride v. Rash Curtis &amp; Associates</i> , Case No. 2:16-cv-02390-TLN-CKD (E.D. Cal. July 24, 2017).	N/A	Yes	Relevance FRE 400-403	
<b>72</b>	Defendant Rash Curtis & Associates' Responses to Plaintiff's Interrogatories (Set One) in <i>Oliver v. Rash Curtis &amp; Associates</i> , Case No. 2:16-cv-02413-TLN-CKD (E.D. Cal. July 24, 2017).	N/A	No	Relevance FRE 400-403	
<b>73</b>	Defendant Rash Curtis & Associates' Reply Brief in Support of Motion for Summary Judgment or Partial Summary Judgment, ECF Doc. No. 157, at 13:6-13.	N/A	No	Relevance FRE 400-403	
<b>74</b>	T-Mobile Certification from Kevin Koslosky	Colin B. Weir	No	Relevance FRE 400-403 FRE 702	
<b>75</b>	T-Mobile Production from Kevin Koslosky	Colin B. Weir	No	Relevance FRE 400-403 FRE 702	
<b>76</b>	Account Record Abbreviations RCA000192-193	N/A	Yes		
<b>77</b>	Skip Tracing Instructions RCA000195-199	N/A	Yes		
<b>78</b>	Unredacted Perez Account Notes RCA000268-271	Dan Correa	No	Not Perez.	
<b>79</b>	5/5/2015 email w. B. Keith to T. Paff RCA-278403	Bob Keith	Yes		
<b>80</b>	11/19/15 emails w. B. Keith, T. Paff, C. Paff re cell phones	Bob Keith	No	Relevance FRE 400-403	



<b>TRIAL EXHIBIT NO.</b>	<b>DESCRIPTION</b>	<b>SPONSORING WITNESS</b>	<b>STIP. TO ADMIT</b>	<b>OBJECTION</b>	<b>DATE ADMITTED</b>
	RCA-282301-282303			Attorney-Client Privileged	
<b>81</b>	8/3/15 emails w/ B. Keith, N. Keith, C. Paff, T. Paff, N. Paff re cell phones RCA-281392	Chris Paff	No	Relevance FRE 400-403 Attorney-Client Privileged	
<b>82</b>	11/19/15 emails w. T. Paff, C. Paff, B. Keith re cell phones RCA-282306-282308	Chris Paff	No	Relevance FRE 400-403 Attorney-Client Privileged	
<b>83</b>	5/5/16 email w. B. Keith, C. Paff, D. Correa, T. Paff, N. Paff RCA-268070	Bob Keith	No	Relevance FRE 400-403	
<b>84</b>	Transcript/Video Excerpts from 4/13/17 Deposition of Steven Kizer	Steven Kizer	Yes		
<b>85</b>	Transcript/Video Excerpts from 10/16/17 Deposition of Nick Keith	Nick Keith	Yes		
<b>86</b>	Transcript/Video Excerpts from 10/20/17 Deposition of Dan Correa	Dan Correa	Yes		
<b>87</b>	Transcript/Video Excerpts from 10/24/17 Deposition of Robert Keith	Bob Keith	Yes		
<b>88</b>	Transcript/Video Excerpts from 10/24/17 Deposition of Chris Paff	Chris Paff	Yes		

## II. DEFENDANT'S TRIAL EXHIBIT LIST:

TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STIP. TO ADMIT	OBJECTION	DATE ADMITTED
501	Plaintiffs' Class Action Complaint, filed June 17, 2016 (ECF Doc. No. 1).	Ignacio Perez	No	MIL 5, FRE 802	
502	Defendant Rash Curtis & Associates' Answer to Plaintiffs' Class Action Complaint, filed July 18, 2016 (ECF Doc. No. 10).	Bob Keith	No	MIL 5, FRE 802	
503	Rash Curtis' Collection Notes/Business Records for Daniel Reynoso (RCA 268-271).	Bob Keith	Yes		
504	Daniel Reynoso's Medical Records from Sutter General Hospital (RCA 272-278).	Bob Keith	No	MIL 2, FRE 802, 403, FRCP 37	
505	May 5, 2017 Email from Bob Keith to Mike Paff attaching Sutter General Hospital's Client Notes for Daniel Reynoso (RCA 012718-012724).	Bob Keith	No	MIL 2, FRE 802, 403, 801, 803	
506	Rash Curtis' Business Records, showing the ECA Advanced Trace Report received as to Daniel Reynoso, which shows the cell phone number ending in 5193 was not skip-traced (RCA 279).	Nick Keith	No	MIL 1, FRCP 37	

<b>TRIAL EXHIBIT NO.</b>	<b>DESCRIPTION</b>	<b>SPONSORING WITNESS</b>	<b>STIP. TO ADMIT</b>	<b>OBJECTION</b>	<b>DATE ADMITTED</b>
<b>507</b>	Rash Curtis' Business Records, showing the Edit Tracking Report for Daniel Reynoso's account, which shows the cell phone number ending in 5193 was provided to Rash Curtis by Sutter General Hospital on May 7, 2015 and removed by Rash Curtis on June 7, 2016 (RCA 280).	Nick Keith	No	MIL 1, FRCP 37	
<b>508</b>	Rash Curtis' Business Records, showing the ECA Advanced Trace Report as to Jessica Adekoya, which shows the cell phone number ending in 5496 was not skip-traced (RCA 266-267).	Nick Keith	No	MIL 1, FRCP 37, FRE 401, 402, 403, MIL 4	
<b>509</b>	Rash Curtis' Collection Notes/Business Records for Geraldine Caldwell (RCA 258-263).	Bob Keith	No	MIL 4, FRE 401, 402, 403	
<b>510</b>	Rash Curtis' Collection Notes/Business Records for Jessica Adekoya (RCA 248-257).	Bob Keith	No	MIL 4, FRE 401, 402, 403	
<b>511</b>	Rash Curtis' Abbreviation Key for Collection Notes (RCA 192-193).	Bob Keith	Yes		
<b>512</b>	Plaintiffs' Notice of Subpoenas to Produce Documents and Subpoenas to T-Mobile USA, Inc., LexisNexis Risk Data Management, Inc., and LexisNexis Risk Solutions FL, Inc., served on April 26, 2017.	Ignacio Perez	No	FRE 401, 403	

<b>TRIAL EXHIBIT NO.</b>	<b>DESCRIPTION</b>	<b>SPONSORING WITNESS</b>	<b>STIP. TO ADMIT</b>	<b>OBJECTION</b>	<b>DATE ADMITTED</b>
<b>513</b>	Phone Records Produced by T-Mobile (MetroPCS) in Response to Plaintiffs' Subpoena, produced on August 16, 2017.	Ignacio Perez	Yes		
<b>514</b>	September 6, 2017 Order Granting Plaintiffs' Motion for Class Certification (ECF Doc. No. 81).	N/A	No	MIL 5, FRE 801, 802, 403	
<b>515</b>	February 2, 2018 Order Re: Cross Motions for Summary Judgment; Denying Motion for Stay (ECF Doc. No. 167).	N/A	No	MIL 5, FRE 801, 802, 403	
<b>516</b>	True and correct copies of excerpts from the Deposition of Nick Keith, taken October 16, 2017.	Nick Keith	No	MIL 7	
<b>517</b>	True and correct copies of excerpts from the Deposition of Daniel Correa, taken October 20, 2017.	Daniel Correa	No	MIL 7	
<b>518</b>	True and correct copies of excerpts from the Deposition of Chris Paff, taken October 24, 2017.	Chris Paff	No	MIL 7	
<b>519</b>	True and correct copies of excerpts from the Deposition of Robert Keith, taken October 24, 2017.	Robert Keith	No	MIL 7	
<b>520</b>	True and correct copies of excerpts from the Deposition of Plaintiff Ignacio Perez, taken July 13, 2017.	Ignacio Perez	No	MIL 7	

<b>TRIAL EXHIBIT NO.</b>	<b>DESCRIPTION</b>	<b>SPONSORING WITNESS</b>	<b>STIP. TO ADMIT</b>	<b>OBJECTION</b>	<b>DATE ADMITTED</b>
<b>521</b>	True and correct copies of excerpts from the Deposition of Steven Kizer, taken April 13, 2017.	Steven Kizer	No	MIL 7	
<b>522</b>	December 20, 2018 Invoice from Class Experts Group, LLC to Bursor & Fisher, P.A. (McMillion000099).	Anya Verkhovskaya	Yes		
<b>523</b>	True and correct excerpts from “5 Fuzzy Match Output Step 2 Final” (not bates-stamped).	Anya Verkhovskaya	Yes		
<b>524</b>	True and correct excerpts from “2018-10-16 historical 1-4 version 1 101518” Spreadsheet (not bates-stamped).	Nick Keith	Yes		
<b>525</b>	Plaintiffs’ Notice of Subpoena and Subpoena to Testify at a Deposition in a Civil Action to DAKCS Software Systems, Inc., served on October 11, 2017.	Ignacio Perez	No	FRE 401, 403	
<b>526</b>	Business Records Produced by DAKCS Software Systems, Inc. in Response to Plaintiffs’ Subpoena, produced on November 2, 2017 (DAKCS 00001-00266).	Ignacio Perez	Yes		
<b>527</b>	October 16, 2015 Email from Steven Kizer to Bob Keith and Chris Paff regarding Rash Curtis’ policies on skip-tracing and removing phone numbers upon Do-Not-Call requests (RCA 125254-125255).	Bob Keith	No	FRE 801, 802, 803	

<b>TRIAL EXHIBIT NO.</b>	<b>DESCRIPTION</b>	<b>SPONSORING WITNESS</b>	<b>STIP. TO ADMIT</b>	<b>OBJECTION</b>	<b>DATE ADMITTED</b>
<b>528</b>	February 28, 2014 Email from Ashlee Hyden of DAKCS Software Systems, Inc. to Chris Paff regarding cell phone scrub technology (RCA 040794).	Chris Paff	No	FRE 801, 802, 803	
<b>529</b>	May 16, 2016 Email from Nick Keith to Daniel Correa regarding GlobalConnect's outbound limitations (RCA 133979-133982).	Nick Keith	No	FRE 801, 802, 803	
<b>530</b>	August 4, 2015 Email from Nick Keith to Bob Keith regarding phone numbers supplied to Rash Curtis from its creditor-clients (RCA 258388-258391).	Nick Keith/Bob Keith	No	FRE 801, 802, 803	
<b>531</b>	August 4, 2015 Email from Nick Keith to Bob Keith regarding Rash Curtis' policy to separate verified phone numbers from unverified phone numbers (RCA 258397-258400).	Nick Keith/Bob Keith	No	FRE 801, 802, 803	
<b>532</b>	December 11, 2017 Email from Randall Snyder to Yeremey Krivoshey (McMillion000013-000026).	Randall Snyder	Yes		
<b>533</b>	January 30, 2018 Email from Anya Verkhovskaya to Yeremy Krivoshey (McMillion000034).	Anya Verkhovskaya	Yes		
<b>534</b>	January 30, 2018 Email from Yeremey Krivoshey to Anya Verkhovskaya (McMillion000035).	Yeremey Krivoshey	Yes		

<b>TRIAL EXHIBIT NO.</b>	<b>DESCRIPTION</b>	<b>SPONSORING WITNESS</b>	<b>STIP. TO ADMIT</b>	<b>OBJECTION</b>	<b>DATE ADMITTED</b>
<b>535</b>	January 30, 2018 Email from Anya Verkhovskaya to Yeremey Krivoshey (McMillion000036).	Anya Verkhovskaya	Yes		
<b>536</b>	November 27, 2018 Email from Randall Snyder to Yeremey Krivoshey (McMillion000053).	Randall Snyder	Yes		
<b>537</b>	November 28, 2018 Email from Randall Snyder to Yeremey Krivoshey (McMillion000054-000055).	Randall Snyder	Yes		
<b>538</b>	December 11, 2018 Email from Rebecca Richter to Randall Snyder (McMillion000072).	Randall Snyder	Yes		
<b>539</b>	May 2, 2017 Email from Colin Weir to Scott Bursor (McMillion000086).	Colin Weir	Yes		
<b>540</b>	September 5, 2017 Email from Colin Weir to Scott Bursor (McMillion000087).	Colin Weir	Yes		
<b>541</b>	September 4, 2018 Email from Colin Weir to Scott Bursor (McMillion000088).	Colin Weir	Yes		
<b>542</b>	January 2, 2018 Email from Colin Weir to Scott Bursor (McMillion000089).	Colin Weir	Yes		
<b>543</b>	March 1, 2018 Email from Colin Weir to Scott Bursor (McMillion000090).	Colin Weir	Yes		

<b>TRIAL EXHIBIT NO.</b>	<b>DESCRIPTION</b>	<b>SPONSORING WITNESS</b>	<b>STIP. TO ADMIT</b>	<b>OBJECTION</b>	<b>DATE ADMITTED</b>
<b>544</b>	February 1, 2018 Email from Colin Weir to Scott Bursor (McMillion000091).	Colin Weir	Yes		
<b>545</b>	August 1, 2018 Email from Colin Weir to Scott Bursor (McMillion000092).	Colin Weir	Yes		
<b>546</b>	April 2, 2018 Email from Colin Weir to Scott Bursor (McMillion000093).	Colin Weir	Yes		
<b>547</b>	June 1, 2017 Email from Colin Weir to Scott Bursor (McMillion000094).	Colin Weir	Yes		
<b>548</b>	December 4, 2017 Email from Colin Weir to Scott Bursor (McMillion000095).	Colin Weir	Yes		
<b>549</b>	December 5, 2018 Email from Colin Weir to Scott Bursor (McMillion000096).	Colin Weir	Yes		
<b>550</b>	November 1, 2018 Email from Colin Weir to Scott Bursor (McMillion000097).	Colin Weir	Yes		
<b>551</b>	October 2, 2018 Email from Colin Weir to Scott Bursor (McMillion000098).	Colin Weir	Yes		
<b>552</b>	December 17, 2018 Invoice from Wireless Research Services to Bursor & Fisher, P.A. (McMillion000076).	Colin Weir	Yes		



<b>TRIAL EXHIBIT NO.</b>	<b>DESCRIPTION</b>	<b>SPONSORING WITNESS</b>	<b>STIP. TO ADMIT</b>	<b>OBJECTION</b>	<b>DATE ADMITTED</b>
<b>553</b>	November 28, 2018 Email from Randall Snyder to Yeremey Krivoshey (McMillion000059- 000060).	Randall Snyder	Yes		
<b>554</b>	True and correct copies of excerpts from the Deposition of Anya Verkhovskaya, taken December 6, 2018.	Anya Verkhovskaya	No	MIL 7	
<b>555</b>	Excerpts from the Spreadsheet Associated with Anya Verkhovskaya's Rule 26 Report (Exhibit 2 to the Deposition of Anya Verkhovskaya).	Anya Verkhovskaya	Yes		
<b>556</b>	Notice of Deposition of Anya Verkhovskaya (Exhibit 3 to the Deposition of Anya Verkhovskaya).	Anya Verkhovskaya	No	FRE 401, 403	
<b>557</b>	Declaration of Anya Verkhovskaya (Exhibit 4 to the Deposition of Anya Verkhovskaya).	Anya Verkhovskaya	Yes		
<b>558</b>	Retainer Agreement between Anya Verkhovskaya and Bursor & Fisher, P.A. (Exhibit 5 to the Deposition of Anya Verkhovskaya).	Anya Verkhovskaya	Yes		
<b>559</b>	Invoice 1022 from CEG to Bursor & Fisher, P.A. (Exhibit 6 to the Deposition of Anya Verkhovskaya).	Anya Verkhovskaya	Yes		

<b>TRIAL EXHIBIT NO.</b>	<b>DESCRIPTION</b>	<b>SPONSORING WITNESS</b>	<b>STIP. TO ADMIT</b>	<b>OBJECTION</b>	<b>DATE ADMITTED</b>
<b>560</b>	Invoice 1121 from CEG to Bursor & Fisher, P.A. (Exhibit 7 to the Deposition of Anya Verkhovskaya).	Anya Verkhovskaya	Yes		
<b>561</b>	True and correct copies of excerpts from the Deposition of Colin Weir, taken December 11, 2018.	Colin Weir	No	MIL 7	
<b>562</b>	Notice of Deposition of Colin Weir (Exhibit 1 to the Deposition of Colin Weir).	Colin Weir	No	FRE 401, 403	
<b>563</b>	Declaration of Colin Weir (Exhibit 2 to the Deposition of Colin Weir).	Colin Weir	Yes		
<b>564</b>	Engagement Agreement between Colin Weir and Bursor & Fisher, P.A. (Exhibit 3 to the Deposition of Colin Weir).	Colin Weir	Yes		
<b>565</b>	November 30, 2018 Invoice from Economics and Technology, Inc. to Bursor & Fisher, P.A. (Exhibit 4 to the Deposition of Colin Weir).	Colin Weir	Yes		
<b>566</b>	Further Invoices from Economics and Technology, Inc. to Bursor & Fisher, P.A. (Exhibit 5 to the Deposition of Colin Weir).	Colin Weir	Yes		

<b>TRIAL EXHIBIT NO.</b>	<b>DESCRIPTION</b>	<b>SPONSORING WITNESS</b>	<b>STIP. TO ADMIT</b>	<b>OBJECTION</b>	<b>DATE ADMITTED</b>
<b>567</b>	Statement of Qualifications of Colin Weir (Exhibit 6 to the Deposition of Colin Weir).	Colin Weir	Yes		
<b>568</b>	True and correct copies of excerpts from the Deposition of Randall Snyder, taken December 17, 2018.	Randall Snyder	No	MIL 7	
<b>569</b>	Notice of Deposition of Randall Snyder (Exhibit 1 to the Deposition of Randall Snyder).	Randall Snyder	No	FRE 401, 403	
<b>570</b>	Curriculum Vitae (Professional Summary) of Randall Snyder (Exhibit 2 to the Deposition of Randall Snyder).	Randall Snyder	Yes		
<b>571</b>	Curriculum Vitae (Litigation Support Experience) of Randall Snyder (Exhibit 3 to the Deposition of Randall Snyder).	Randall Snyder	Yes		
<b>572</b>	Wireless Research Services, LLC 2017 Rate Sheet and Retained Agreement with Bursor & Fisher, P.A. (Exhibit 4 to the Deposition of Randall Snyder).	Randall Snyder	Yes		
<b>573</b>	November 12, 2018 Supplemental Declaration of Randall Snyder (Exhibit 5 to the Deposition of Randall Snyder).	Randall Snyder	Yes		

<b>TRIAL EXHIBIT NO.</b>	<b>DESCRIPTION</b>	<b>SPONSORING WITNESS</b>	<b>STIP. TO ADMIT</b>	<b>OBJECTION</b>	<b>DATE ADMITTED</b>
<b>574</b>	May 29, 2017 Invoice from Wireless Research Services, LLC to Bursor & Fisher, P.A (Exhibit 6 to the Deposition of Randall Snyder).	Randall Snyder	Yes		
<b>575</b>	“Exactly What Is An Autodialer?” Power-point Presentation (Exhibit 7 to the Deposition of Randall Snyder).	Randall Snyder	Yes		
<b>576</b>	May 30, 2017 Declaration of Randall Snyder (Exhibit 9 to the Deposition of Randall Snyder).	Randall Snyder	No	FRE 403	
<b>577</b>	October 16, 2017 Declaration of Randall Snyder (Exhibit 10 to the Deposition of Randall Snyder).	Randall Snyder	No	FRE 403	
<b>578</b>	December 11, 2017 Declaration of Randall Snyder (Exhibit 11 to the Deposition of Randall Snyder).	Randall Snyder	No	FRE 403	
<b>579</b>	March 5, 2018 Declaration of Randall Snyder (Exhibit 12 to the Deposition of Randall Snyder).	Randall Snyder	No	FRE 403	
<b>580</b>	True and Correct Excerpts from the June 20, 2017 Deposition of Steve Kizer (Exhibit 14 to the Deposition of Randall Snyder).	Randall Snyder, Steven Kizer	No	MIL 7, MIL 5, FRE 401, 403	

TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STIP. TO ADMIT	OBJECTION	DATE ADMITTED
581	December 11, 2017 Declaration of Bob Keith (Exhibit 15 to the Deposition of Randall Snyder).	Randall Snyder	No	MIL 5, FRE 401, 403	
582	Daniel Reynoso's Account Records (Exhibit 16 to the Deposition of Randall Snyder).	Randall Snyder	Yes		
583	Complaint for TCPA damages, styled <i>Diane Steele v. Rash Curtis &amp; Associates</i> , United States District Court, Eastern District of California, Case No. 2:17-cv-02626-JAM-AC, filed 12/15/17.	Bob Keith	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
584	Medical account overview from Contra Costa Regional Medical Center for Steven Milligan, showing the 925-435-6429 phone number and that the account was assigned to Rash Curtis for collection.	Bob Keith	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
585	Medical account overview for Diane Steele, showing the 925-435-6429 phone number and that the account was assigned to Rash Curtis for collection.	Bob Keith	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	

TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STIP. TO ADMIT	OBJECTION	DATE ADMITTED
586	True and Correct Excerpts from the June 20, 2017 Deposition of Steven Kizer from <i>Rash Curtis &amp; Associates, Inc. v. Steven Kizer</i> , Superior Court of the State of California County of Solano Case No. FCS048565.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
587	True and Correct Excerpts from the July 6, 2017 Deposition of Steven Kizer from <i>Rash Curtis &amp; Associates, Inc. v. Steven Kizer</i> , Superior Court of the State of California County of Solano Case No. FCS048565.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
588	Complaint for the Labor Commissioner's Office filed by Steven Kizer against Rash Curtis, State Case No. 08-78737, filed September 16, 2016	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
589	Final Order and Decision in Kizer's Labor Board case against Rash Curtis, State Case No. 08-78737, dated August 22, 2018.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
590	Kizer's "Notice of Claim" and time/wages claimed in State Case No. 08-78737, dated January 20, 2017.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
591	Personnel Action Form for Steven Kizer, signed by Steven Kizer on December 1, 2012.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	

<b>TRIAL EXHIBIT NO.</b>	<b>DESCRIPTION</b>	<b>SPONSORING WITNESS</b>	<b>STIP. TO ADMIT</b>	<b>OBJECTION</b>	<b>DATE ADMITTED</b>
<b>592</b>	Inbound Phone Line; Expectations and Rules, signed by Steven Kizer on July 2, 2015.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
<b>593</b>	Certificate of Completion – Workplace Harassment: Prevention and the law-Supervisor Field 120, certifying Steven Kizer’s completion on May 28, 2013.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
<b>594</b>	Policy & Procedure: Harassment Free Workplace (“Management”), signed by Steven Kizer on March 17, 2015.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
<b>595</b>	Interoffice Memo to exempt employees, signed by Steven Kizer on December 17, 2015.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
<b>596</b>	Kizer email dated May 26, 2016.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
<b>597</b>	Payroll Summary re Steven Kizer 12/2012 – 12/2015.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
<b>598</b>	Kizer email with self- authored Biography, dated May 6, 2013	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
<b>599</b>	Work Order Guidelines issued by Steven Kizer dated March 12, 2013.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	

<b>TRIAL EXHIBIT NO.</b>	<b>DESCRIPTION</b>	<b>SPONSORING WITNESS</b>	<b>STIP. TO ADMIT</b>	<b>OBJECTION</b>	<b>DATE ADMITTED</b>
<b>600</b>	Steven Kizer's resume	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
<b>601</b>	Steven Kizer's IT Job Description.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
<b>602</b>	Steven Kizer's LinkedIn Resume	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
<b>603</b>	Steven Kizer's internal email communications at Rash Curtis	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
<b>604</b>	Excerpts from Steven Kizer's Absence/Schedule Adjustment Request Forms	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
<b>605</b>	Steven Kizer's Paid Time Off Statements	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
<b>606</b>	Email re Steven Kizer's FMLA/CFRA Leave, dated March 21, 2016	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
<b>607</b>	Comparison Exhibits re wage claims and PTO	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	



1 Dated: March 4, 2019

Respectfully submitted,

2 **BURSOR & FISHER, P.A.**

3 By: /s/ Yeremey Krivoshey  
4 Yeremey Krivoshey

5 L. Timothy Fisher (State Bar No. 191626)  
6 Yeremey Krivoshey (State Bar No.295032)  
7 Blair E. Reed (State Bar No. 316791)  
8 1990 North California Blvd., Suite 940  
9 Walnut Creek, CA 94596  
Telephone: (925) 300-4455  
Email: ltfisher@bursor.com  
ykrivoshey@bursor.com  
breed@bursor.com

10 **BURSOR & FISHER, P.A.**

11 Scott A. Bursor (State Bar No. 276006)  
12 888 Seventh Avenue  
13 New York, NY 10019  
Telephone: (212) 989-9113  
Facsimile: (212) 989-9163  
E-Mail: scott@bursor.com

14 *Attorneys for Plaintiff*

15  
16 Dated: March 4, 2019

**ELLIS LAW GROUP LLP**

17 By: /s/ Mark E. Ellis  
18 Mark E. Ellis

19 Mark E. Ellis (State Bar No. 127159)  
20 Anthony P.J. Valenti (State Bar No. 288164)  
21 Lawrence K. Iglesias (State Bar No. 303700)  
22 1425 River Park Drive, Suite 400  
23 Sacramento, CA 95815  
24 Tel: (916) 283-8820  
25 Fax: (916) 283-8821  
26 mellis@ellislawgrp.com  
27 avalenti@ellislawgrp.com  
28 liglesias@ellislawgrp.com

*Attorneys for Defendant*